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Zoraya Arguelles Vrooman admitted to the Bar of Peru

March 13, 2008

Hillary Fromer, Esq. By Fax: 212 788 9776

Re: Manganiello v. City of New York

Dear Ms. Fromer:

I again write to address outstanding discovery issues. At the deposition of Dr. Latif, you made reference to previous psychological applications by the Plaintiff. Plaintiff's demand for production of documents included a demand for all applications filed by Plaintiff with the N.Y.P.D., including all psychological evaluations (#15). We again demand immediate production.

Further, today at Mr. Ortiz's deposition, he identified his partner as Eric Rodriguez, Shield number 12042. He testified that his partner was transferred to Transit. We again demand that Officer Rodriguez.

Very truly yours,

Michael H. Joseph, Esq.